Remarks

Allowance of all claims is respectfully requested. Claims 1 & 4-36 remain pending. Initially, Applicants gratefully acknowledge the indication of allowability of claims 4-6, 15-17 and 27-29 if rewritten into independent form including all the limitations of the base claim and any intervening claims. Presently, these dependent claims have not been rewritten into independent form since the claims from which they depend are believed to be in condition for allowance for the reasons stated hereinbelow.

Substantively, claims 1, 7-14, 18-26 and 30-36 stand rejected under 35 U.S.C. 102(b) as being anticipated by Pitkin et al. (U.S. Patent No. 5,341,477). Applicants respectfully traverse this rejection and request reconsideration thereof.

In one example, Applicants claim a method of controlling system traffic of a clustered computing environment (e.g., claim 1). The method includes mapping one or more node addresses, for a service to be provided, to one or more network objects defined for the service, wherein the mapping of a node address comprises performing one or more operations on the node address to locate a particular network object of a plurality of network objects, the particular network object corresponding to the node address and including a network priority assigned to the node address for the service to be provided, the network priority indicating an order of preference for using one network over another network to access the service. The method further includes: obtaining from the one or more network objects one or more network priorities of the service; and contacting the service based on the one or more network priorities. Thus, in Applicants' claimed invention, one or more operations are performed on a node address to obtain a particular network object corresponding to that node address. The particular network object includes the network priority associated with that node address. Therefore, the network priority for the service for a particular node address is obtained from a network object associated with that node address. This processing is believed clearly different from the teachings and suggestions of Pitkin.

With respect to the anticipation rejection, it is well settled that there is no anticipation of a claim unless a single prior art reference discloses: (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as

the claimed invention; and (4) in order to perform the identical function as the claimed invention. In this instance, Pitkin fails to disclose various aspects of Applicants' claimed process for controlling system traffic in a clustered computing environment, and as a result, does not anticipate (or even render obvious) Applicants' invention.

Pitkin describes the use of a broker to select a server to be used by a client to access a service. When the broker receives a client request, the broker selects, based on a round robin approach, a server from a list of servers that can service that request (see, e.g., Col. 3, lines 1-30). The broker then informs the client of the server to use. There is no description, teaching or suggestion in Pitkin of mapping a node address for a service to be provided to a network object defined for that service, wherein the mapping of the node address includes performing one or more operations on the node address to locate a particular network object. Further, there is no description, teaching, or suggestion in Pitkin that the particular network object that was located after performing the operation on the node address includes a network priority assigned to the node address for that service to be provided. At least these aspects of Applicants' claimed process are missing from Pitkin.

Pitkin merely describes the creating of a list of servers that may service a request based on the capacities of those servers. There is absolutely no description in Pitkin of taking a node address and performing an operation on that node address to locate a particular network object (i.e., a network definition), which includes a network priority that indicates which network to use to access the service. This processing of Applicants' claimed invention is simply missing from Pitkin.

In the Office Action, various sections of Pitkin are cited as allegedly teaching Applicants' claimed process for controlling system traffic. However, Applicants respectfully submit that those sections, as well as other sections of Pitkin, fail to teach or suggest their claimed process. For example, the cited sections fail to teach or suggest at least Applicants' claimed element of mapping a node address for a service to be provided to a network object defined for the service, wherein the mapping of the node address comprises performing one or more operations on the node address to locate a particular network object of a plurality of network objects. Again, there is no discussion in Pitkin of performing an operation on a node address to locate a particular

network object. To further explain, Applicants will discuss each section cited in the Office Action.

With respect to the functionality of the first element of Applicants' claimed process, the Office Action first cites Col. 2, lines 42-47 of Pitkin. This section discloses that service limitations for a requested service are preferably established, as a matter of policy, during the network design and modelling process by a system or network manager, and that based upon that policy, a broker may suggest to a client a server which is best able to satisfy the client's service request. However, there is no discussion in the cited lines of taking a node address and performing an operation on that node address to locate a particular network object corresponding to that node address. As indicated above, Pitkin discloses selecting a server as a matter of policy. In contrast, in Applicants' claimed process, an operation is performed on the node address to locate a particular network object corresponding to that node address. There is no suggestion in Pitkin of performing an operation on, for example, a server node address, to somehow locate a network object that relates to that server node address. In Applicants' claimed invention, the network object refers to a network definition, and as described further below, relates to selecting one network over another network (as recited in the independent claims).

Another cited section of Pitkin is Col. 3, lines 3-8. This section describes that the network policy is based on the server's capacity to deliver a given service. However, there is no teaching or suggestion of mapping a node address to a network object, wherein the mapping includes performing an operation on the node address to locate a particular network object. This is simply not suggested by looking at the server's capacity to deliver a given service.

Further sections of Pitkin cited are at Col. 6, lines 39-42 and Col. 6, lines 61-65. These sections describe that a server list is created for a service and that in response to a client request for service, a broker examines connection entries to determine a particular server's capacity. Another section that was cited is Col. 10, lines 20-27 of Pitkin. This section discusses whether a particular server is available at the time a request comes in. Again, these cited lines of Pitkin are silent as to suggesting mapping of a node address to a service to be provided, wherein the mapping includes performing one or more operations on the node address to locate a particular network object as recited in Applicants' process.

It is further stated in the Office Action: "Note that the client accesses the broker via an address and then an operation is performed to provide a provider service address." Applicants respectfully submit that even if an address is used by the client to access the broker, there is still no teaching or suggestion in Pitkin of performing an operation on the node address to locate a particular network object. There is no description of performing any operation on the node address itself to locate a network object.

For at least the above reasons, Applicants respectfully submit that Pitkin does not teach or suggest their claimed invention.
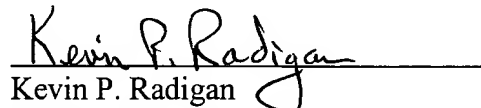
Further, the functionality of Applicants' process recited in the first element of the independent claims specifies that the particular network object (selected by performing the operation on the node address, and corresponding to the node address) includes a network priority assigned to the node address for the service to be provided. This network priority indicates an order of preference for using one network over another network to access the service. A careful reading of Pitkin fails to uncover any description or suggestion of using a priority value of a located network object to determine whether to use one network or another network to access a service. Pitkin simply employs a round robin approach to selecting a server from a list of servers. This is explicitly described at Col. 3, lines 28-31 thereof. There is no teaching or suggestion that this approach to selecting servers in any way relates to Applicants' recited functionality wherein the located network object includes a network priority assigned to the node address for the service to be provided, and that this network priority now indicates an order of preference for using one network over another network to access a service. Further, the above cited sections of Pitkin set forth in the final Office Action do not address this aspect of Applicants' claimed invention. Applicants' recited network priority provides a preferenced indication for using one network over another network to access the service. No similar functionality is taught or suggested in Pitkin.

For at least this reason, Applicants respectfully submit that Pitkin does not teach or suggest their claimed invention. The dependent claims are patentable for the same reasons as the independent claims, as well as for their own additional features.

For all of the above reasons, Applicants request reconsideration and allowance of all claims.

Should the Examiner wish to discuss this case with Applicants' attorney, the Examiner is invited to contact their below-listed representative.

Respectfully submitted,

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